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Of Attorneys for Creditor PacWest Funding Inc.,
dba Precision Capital, agent for PC0120N Joint Venture

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

Portland Division

In re

RODA, LLC

Debtor.

Case No. 23-30250-thp11

**MOTION TO APPEAR BY
REMOTE MEANS**

MOTION

Creditor PacWest Funding Inc., dba Precision Capital, agent for PC0120N Joint Venture (the **Secured Creditor**), hereby moves the Court for an Order allowing counsel for the Secured Creditor to appear by remote means by video or telephone at the evidentiary hearing regarding Debtor's Motion for Order Authorizing Use of Cash Collateral of Debtor's-In-Possession and Granting Adequate Protection, scheduled for February 28, 2023, at 1:30 p.m.

Due to ongoing health issues impacting travel, good cause exists to permit remote appearance by video or telephone. The undersigned counsel's primary office is located in Eugene, Oregon, and lives in Eugene, Oregon.

In support of Secured Creditor's motion is the attached declaration of Julia I. Manela.

WHEREFORE, the Secured Creditor prays for an Order allowing counsel for Secured Creditor to appear by remote means as set forth in this application.

DATED: February 22, 2023.

WATKINSON LAIRD RUBENSTEIN, P.C.

By: s/ Julia I. Manela

Julia I. Manela, OSB No. 023771

541-484-2277

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**DECLARATION OF JULIA I. MANELA
IN SUPPORT OF MOTION TO APPEAR
BY REMOTE MEANS**

I, Julia I. Manela, declare under penalty of perjury that the foregoing is true and correct:

1. I am one of the attorneys for Creditor PacWest Funding Inc., dba Precision Capital, and I make this declaration in support of its Motion to Appear by Remote Means.
2. Due to my ongoing health issues impacting travel, good cause exists to permit remote appearance by video or telephone. My primary office is located in Eugene, Oregon, and I live in Eugene, Oregon.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on the 22nd day of February 2023.

s/ Julia I. Manela
Julia I. Manela, OSB No. 023771

DECLARATION OF JULIA I. MANELA

CERTIFICATE OF SERVICE

I certify that on February 22, 2023, I served or caused to be served a true, correct, and complete copy of **MOTION TO APPEAR BY REMOTE MEANS and SUPPORTING DECLARATION OF JULIA I. MANELA** via ECF/CM to the ECF Registered Participants listed below:

KATHRYN EVANS on behalf of U.S. Trustee US Trustee, Portland
Kathryn.Evans@usdoj.gov

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